



State of Utah

Department of  
Environmental Quality

Dianne R. Nielson, Ph.D.  
*Executive Director*

DIVISION OF AIR QUALITY  
Richard W. Sprott  
*Director*

JON M. HUNTSMAN, JR.  
*Governor*

GARY HERBERT  
*Lieutenant Governor*

DAQE-IN3326001-06

July 17, 2006

Bridgett Laukhuff  
Conestoga Wood Specialties Corporation  
PO Box 911  
Seguin, Texas 78156-911

Dear Ms. Laukhuff:

Re: Intent to Approve: Application for a Kitchen Cabinet Manufacturing, Tooele County – CDS B  
Project Code: N3326-001

The attached document is the Intent to Approve (ITA) for the above-referenced project. ITAs are subject to public review. Any comments received shall be considered before an Approval Order is issued.

Future correspondence on this Intent to Approve should include the engineer's name as well as the DAQE number as shown on the upper right-hand corner of this letter. Please direct any technical questions you may have on this project to Mr. Tom Bradley. He may be reached at (801) 536-4014.

Sincerely,

C.C. Patel, P.E., Manager  
Minor New Source Review Section

CCP:TJB:kw

cc: Tooele County Health Department

**STATE OF UTAH**

**Department of Environmental Quality**

**Division of Air Quality**

**INTENT TO APPROVE: Application for a  
Kitchen Cabinet Manufacturing**

**Prepared By: Tom Bradley, Engineer  
(801) 536-4014  
Email: tjbradley@utah.gov**

**INTENT TO APPROVE NUMBER**

**DAQE-IN3326001-06**

**Date: July 17, 2006**

**Conestoga Wood Specialties Corporation**

**Source Contact  
Bridgette Laukhuff  
(717) 445-3388**

**Richard W. Sprott  
Executive Secretary  
Utah Air Quality Board**

### *Abstract*

*Conestoga Wood Specialties Corporation (Conestoga) has requested to operate a kitchen cabinet manufacturing operation. Conestoga will manufacture high volume cabinetry with emissions being mainly in the form particulate matter from cutting, milling, and sanding of lumber. The emissions from this process will be controlled by four baghouses. There will also be VOC emissions from adhesives and UV marking products.*

*Conestoga will be in Tooele located in Tooele County. The area where Conestoga is located in Tooele County is an attainment area of the National Ambient Air Quality Standards (NAAQS). New Source Performance Standards (NSPS), National Emission Standards for Hazardous Air Pollutants (NESHAP) and Maximum Achievable Control Technology (MACT) regulations do not apply to this source. Title V of the 1990 Clean Air Act does not apply to this source.*

*The emissions will result in the following, in tons per year, potential to emit totals:  $PM_{10} = 10.24$ ,  $VOC = 0.03$*

The Notice of Intent (NOI) for the above-referenced project has been evaluated and has been found to be consistent with the requirements of the Utah Administrative Code Rule 307 (UAC R307). Air pollution producing sources and/or their air control facilities may not be constructed, installed, established, or modified prior to the issuance of an Approval Order (AO) by the Executive Secretary of the Utah Air Quality Board.

A 30-day public comment period will be held in accordance with UAC R307-401-7. A notice of intent to approve will be published in the Tooele Transcript on July 18, 2006. During the public comment period the proposal and the evaluation of its impact on air quality will be available for both you and the public to review and comment. If anyone so requests a public hearing it will be held in accordance with UAC R307-401-7. The hearing will be held as close as practicable to the location of the source. Any comments received during the public comment period and the hearing will be evaluated.

Please review the proposed AO conditions during this period and make any comments you may have. The proposed conditions of the AO may be changed as a result of the comments received. Unless changed, the AO will be based upon the following conditions:

#### **General Conditions:**

1. This Approval Order (AO) applies to the following company:

##### Site Office

Conestoga Wood Specialties Corporation  
545 N. Lodestone Way  
Tooele, UT 84074

##### Corporate Office Location

Conestoga Wood Specialties Corporation  
PO Box 158  
East Earl, PA 17519

Phone Number

(717) 445-3388

Fax Number

(717) 445-3427

The equipment listed in this AO shall be operated at the following location:

Street address & UTM: 545 N. Lodestone Way, Tooele

Universal Transverse Mercator (UTM) Coordinate System: 4,487.0 kilometers Northing, 385.7 kilometers Easting, Zone 12, Datum NAD 27

2. All definitions, terms, abbreviations, and references used in this AO conform to those used in the Utah Administrative Code (UAC) Rule 307 (R307) and Title 40 of the Code of Federal Regulations (40 CFR). Unless noted otherwise, references cited in these AO conditions refer to those rules.
3. The limits set forth in this AO shall not be exceeded without prior approval in accordance with R307-401.
4. Modifications to the equipment or processes approved by this AO that could affect the emissions covered by this AO must be reviewed and approved in accordance with R307-401.
5. All records referenced in this AO, which are required to be kept by the owner/operator, shall be made available to the Executive Secretary or Executive Secretary's representative upon request. Records shall be kept for the following minimum period of two years.
6. Conestoga shall install and operate the four baghouses and shall conduct its operations of the kitchen cabinet manufacturing in accordance with the terms and conditions of this AO, which was written pursuant to Conestoga's Notice of Intent submitted to the Division of Air Quality (DAQ) on May 30, 2006.
7. The approved installations shall consist of the following equipment or equivalent\*:

Four 47,515 acfm baghouses

\* Equivalency shall be determined by the Executive Secretary.

8. A manometer or magnehelic pressure gauge shall be installed to measure the differential pressure across the fabric filter. Static pressure differential across the fabric filter shall be between 1 to 4 inches of water column. The pressure gauge shall be located such that an inspector /operator can safely read the indicator at any time. The reading shall be accurate to within plus or minus 1.0 inches water column. The instrument shall be calibrated according to the manufactures instructions at least once every 12 months.
9. Conestoga shall notify the Executive Secretary in writing when the installation of the equipment listed in Condition #7 has been completed and is operational, as an initial compliance inspection is required. To insure proper credit when notifying the Executive Secretary, send your correspondence to the Executive Secretary, attn: Compliance Section.

If the construction and/or installation has not been completed within eighteen months from the date of this AO, the Executive Secretary shall be notified in writing on the status of the construction and/or installation. At that time, the Executive Secretary shall require

documentation of the continuous construction and/or installation of the operation and may revoke the AO in accordance with R307-401-18.

### **Limitations and Tests Procedures**

10. Visible emissions from the following emission points shall not exceed the following values:

- A. Baghouses - 10% opacity
- B. All other emission sources - 20% opacity

Opacity observations of emissions from stationary sources shall be conducted according to 40 CFR 60, Appendix A, Method 9.

11. The following consumption limits shall not be exceeded:

8,214,207 square feet of rough lumber the company uses per rolling 12-month period

To determine compliance with a rolling 12-month total, the owner/operator shall calculate a new 12-month total by the twentieth day of each month using data from the previous 12 months. Records of consumption shall be kept for all periods when the plant is in operation. Consumption shall be determined by Conestoga. The records of consumption shall be kept on a daily basis.

### **Fuels**

12. The owner/operator shall use natural gas as fuel in the comfort heaters and the evaporative cooler.

### **Monitoring - General Process**

13. The owner/operator shall install, calibrate, maintain, and operate a monitoring device for the continuous measurement of the change in pressure of the gas stream through the baghouses. The monitoring device must be certified by the manufacturer. The monitoring device shall be accurate within plus or minus one inch of water gauge and must be calibrated on an annual basis according to the manufacturer's instructions. Continuous recording for the monitoring device is not required. However, daily records of readings shall be maintained.

### **Records & Miscellaneous**

14. At all times, including periods of startup, shutdown, and malfunction, owners and operators shall, to the extent practicable, maintain and operate any equipment approved under this Approval Order, including associated air pollution control equipment, in a manner consistent with good air pollution control practice for minimizing emissions. Determination of whether acceptable operating and maintenance procedures are being used will be based on the information available to the Executive Secretary which may include,

but is not limited to, monitoring results, opacity observations, review of operating and maintenance procedures, and inspection of the source. All maintenance performed on the equipment authorized by this AO shall be recorded.

15. The owner/operator shall comply with R307-107. General Requirements: Unavoidable Breakdowns.

The Executive Secretary shall be notified in writing if the company is sold or changes its name.

Under R307-150-1, the Executive Secretary may require a source to submit an emission inventory for any full or partial year on reasonable notice.

This AO in no way releases the owner or operator from any liability for compliance with all other applicable federal, state, and local regulations including R307.

A copy of the rules, regulations and/or attachments addressed in this AO may be obtained by contacting the Division of Air Quality. The Utah Administrative Code R307 rules used by DAQ, the Notice of Intent (NOI) guide, and other air quality documents and forms may also be obtained on the Internet at the following web site:

<http://www.airquality.utah.gov/>

The annual emissions estimations below include point source and do not include fugitive emissions, fugitive dust, road dust, tail pipe emissions, grandfathered emissions etc. These emissions are for the purpose of determining the applicability of Prevention of Significant Deterioration, non-attainment area, Maintenance area, and Title V source requirements of the R307. They are not to be used for determining compliance.

The Potential To Emit (PTE) emissions for this source are currently calculated at the following values:

	<u>Pollutant</u>	<u>Tons/yr</u>
A.	PM <sub>10</sub> .....	10.24
B.	VOC .....	0.03

The Division of Air Quality is authorized to charge a fee for reimbursement of the actual costs incurred in the issuance of an AO. An invoice will follow upon issuance of the final Approval Order.

Sincerely,

C.C. Patel, P. E., Manager  
Minor New Source Review Section